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9  
10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA, EASTERN DIVISION**  
12

13 GEORGE GONZALEZ,

14 Plaintiff,

15 v.

16 STATE OF CALIFORNIA; CITY OF  
HEMET; PATRICK SOBASZEK;  
17 ANDREW REYNOSO; SEAN IRICK;  
and DOES 1-10, inclusive,

18 Defendants.  
19

Case No. 5:25-cv-00331 KK(DTBx)

**[DISCOVERY MATTER]**

**APPLICATION TO TAKE  
INMATE'S DEPOSITION IN  
STATE PRISON; PROPOSED  
ORDER FILED CONCURRENTLY**

20 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

21 Defendant, CITY OF HEMET, by and through its attorneys of record,  
22 pursuant to Rule 30(a)(2)(B) of the Federal Rules of Civil Procedure, makes the  
23 following request of the Honorable Court:

24 1. For an order permitting the deposition of California Department of  
25 Corrections and Rehabilitation Inmate GEORGE GONZALEZ, on October 27,  
26 2025, or on any other date as directed by State Prison Officials.  
27  
28

**GOOD CAUSE STATEMENT**

1  
2 1. GEORGE GONZALEZ, case number GH252880003, is in the custody  
3 of the California Department of Corrections and Rehabilitation and is currently  
4 being housed at Southwest Detention Center located at 30755 Auld Rd Ste B,  
5 Murrieta, CA 92563

6 2. According to Federal Rule of Civil Procedure 30(a)(2)(B), a party must  
7 obtain leave of court to take a deponent's deposition "if the deponent is confined in  
8 prison."

9 Therefore, for good cause shown, Defendant requests the Honorable Court to  
10 enter an order permitting Defendant to take the deposition of Timothy Helman, on  
11 October 27, 2025, or on any other date as directed by State Prison Officials.

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13  
14 DATED: October 26, 2025

**MANNING & KASS  
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16  
17 By: Khouloud E. Pearson

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19 Andrea K. Kornblau  
20 Khouloud E. Pearson  
21 Attorneys for Defendants CITY OF  
22 HEMET, PATRICK SOBASZEK, and  
23 ANDREW REYNOSO  
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